

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

THOMAS C. and PAMELA MCINTOSH,)

Plaintiffs,)

v.)

Cause No. 1:06cv1080-LTS-RHW

STATE FARM FIRE & CASUALTY CO.,)
et al.,)

Defendants,)
_____)

AFFIDAVIT OF BRIAN FORD

STATE OF GEORGIA
COUNTY OF GWINNETT

1. I, Jesse Brian Ford, am over the age of majority, of sound mind and competent to make this affidavit. All of the statements herein are based on my first-hand personal knowledge.

2. I am a professionally licensed engineer with approximately 32 years of experience and the former Manager of Disaster Preparedness for Mississippi Power Company who was hired by Forensic Analysis & Engineering Corporation ("Forensic"), a company contracted by State Farm Fire & Casualty Company ("State Farm") to inspect hurricane damaged properties on the Mississippi Gulf Coast after Katrina.

3. I was employed by Forensic for the period of approximately September 21, 2005 through October 21, 2005. My employment with Forensic terminated because State Farm was unhappy with the conclusions and/or methodology used to reach the conclusions in reports I authored.

Exhibit 2

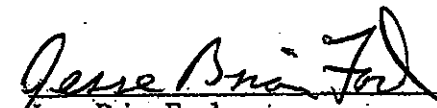
4. During my employment with Forensic, I did not communicate with Scruggs Katrina Group representatives.

5. At no time have I ever received any money in return for testimony. I have only been reimbursed for travel expenses for my October 10, 2007 and January 11, 2008 depositions in the above captioned matter and my appearance at a grand jury proceeding.

6. Following my employment with Forensic, Richard Scruggs and I discussed my possible services as both an expert witness and consultant, for which I would have been compensated commensurate with my current and past salaries and experience as a professionally licensed engineer. For cases in which I would have been used as a fact witness, my only compensation would have been expense reimbursement as described in Paragraph 5 above. No agreement was ever reached with either Richard Scruggs or any member of the Scruggs Katrina Group as to my employment as a consultant or witness.

7. I can recall no instances where attorney Derek Wyatt has ever offered me any fee in exchange for testimony.

Further Affiant sayeth not.


Jesse Brian Ford

Sworn to and subscribed before me, this the 17 day of January, 2008.


NOTARY PUBLIC

My Commission Expires:

Notary Public, Walton County, Georgia
My Commission Expires Feb. 23, 2009